Peper, Martin, Jensen, Maichel and Hetlage Attorneys at Law

SUPERFUND DIVISION

2080 McGregor Boulevard Third Floor Fort Myers, Florida 33901-3419 (941) 337-3850

720 West Main Street Belleville, Illinois 62220-1515 (618) 234-0574 TWENTY-FOURTH FLOOR
720 OLIVE STREET
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WRITER'S DIRECT DIAL NUMBER

1625 West Marion Avenue Punta Gorda, Florida 33950-5295 (941) 637-1955

850 Park Shore Drive Suite 202 Naples, Florida 33940-3587 (941) 281-8525



40045838 SUPERFUND RECORDS (314) 444-6452 November 6, 1995

Steven Kinser, Project Manager U. S. Environmental Protection Agency, Region VII 726 Minnesota Avenue Kansas City, Kansas 66101 Sitelliat falce

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Division 11 L

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Re:

Supplemental Response to 104(e) Information Request West Lake Landfill; Bridgeton, Missouri

Dear Mr. Kinser:

This response is a supplement made on behalf of Mallinckrodt Group, Inc., formerly known as Mallinckrodt, Inc., ("Mallinckrodt") to an Information Request sent by Robert L. Morby, with regard to the West Lake Landfill Site ("West Lake") located in Bridgeton, Missouri. The U.S. Environmental Protection Agency ("EPA") issued this Request on February 11, 1994 pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"). Mallinckrodt initially responded to the Request on March 22, 1994.

Without waiving any of the objections raised in Mallinckrodt's earlier response, Mallinckrodt now supplements its original response as a result of new information discovered subsequent to Mallinckrodt's initial response.

Request No. 1

Without waiving its previous objection to this Request, Mallinckrodt supplements its earlier response to Request No. 1 because of new information. Mallinckrodt states that its subsidiary, Mallinckrodt Chemical, Inc. ("MCI") operates a specialty chemical and pharmaceutical manufacturing facility at 3600 N. Second Street, St. Louis, Missouri, from which one shipment of non-hazardous demolition debris was mistakenly shipped to the West Lake Landfill on March 1, 1995.

Request No. 2

Without waiving its previous objection to this Request, Mallinckrodt supplements its earlier response to Request No. 2 because of new information.

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PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE

Mr. Steven Kinser November 6, 1995 Page 2

(2.a)

Mallinckrodt states that one shipment (Shipment No. 1567) of non-hazardous building demolition debris from Building 91 was mistakenly transported from its St. Louis facility to the West Lake Landfill on March 1, 1995. Although the approved landfill for this material was Browning-Ferris Industries' Missouri Pass Landfill at 2520 Adie Road in Maryland Heights, Missouri, the material was for some unknown reason transported by Able Industries (a.k.a Johnny on the Spot) to the West Lake Landfill without Mallinckrodt's approval.

(2.b)

Mallinckrodt states that the material giving rise to this Supplemental Response was non-hazardous building demolition debris.

(2.c-e)

Mallinckrodt states that the amount of non-hazardous building demolition debris sent to the site was approximately twenty (20) cubic yards. A twenty (20) cubic yard dumpster was used to contain the materials eventually mistakenly disposed of at the West Lake Landfill.

(2.f-g)

Mallinckrodt states that the Environmental Services Department at its St. Louis facility arranged for the pick up, transport and disposal of this material with Able Industries and Browning-Ferris Industries. The disposal of this material in the West Lake Landfill was not approved by Mallinckrodt — the Browning-Ferris Industries Missouri Pass Landfill in Maryland Heights, Missouri was the disposal facility designated and approved by Mallinckrodt for receipt of this material. It is unknown by Mallinckrodt why Able Industries, 7151 N. Market, St. Louis, Missouri transported the materials to the West Lake Landfill.

Request No. 3

Without waiving its previous objections to this Request, Mallinckrodt further supplements its response to Request No. 3 because of new information. Mallinckrodt states that no analysis was performed in regard to this load of demolition debris transported from its St. Louis facility.

Request No. 4

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 4 because of new information. Mallinckrodt states that the Environmental Services Department at its St. Louis facility arranged for the pickup, transport and disposal of the building demolition debris with Able Industries and Browning-Ferris Industries.

PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE

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Request No. 5

Without waiving its previous objections to this Request, Mallinckrodt further supplements its response to Request No. 5 because of new information. Mallinckrodt states that it has not performed and has not had performed any study or investigation to determine the existence and extent of contamination at or near the site other than an internal investigation to supplement this Request. Furthermore, attempts by Mallinckrodt to remove this material from the West Lake Landfill were unsuccessful as the material could not be located within the landfill.

Request No. 6

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 6 because of new information. With respect to the building demolition material giving rise to this Supplemental Response, Mallinckrodt states that no permit or other authorization was obtained nor required for disposal of this material.

Request No. 7

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 7 because of new information. Mallinckrodt states that it issued a purchase order dated November 10, 1994, which was revised December 9, 1994 and January 10, 1995, to Able Industries to haul debris from a plant project which is attached as document number 001. The manifest for the disposal of this waste, designating BFI's Missouri Pass landfill as the receiving facility, is enclosed as document number 002. Able Industries' work order is attached as document number 003. The work order indicates the material is to be dumped at a Laidlaw landfill. However, the identity of the person who signed the work order authorizing disposal is unknown to Mallinckrodt at this time and may be a representative of a Mallinckrodt construction contractor (Rhodey & Son).

If you have any questions with regard to the foregoing, please contact Patricia Hitt Duft, Senior Attorney at Mallinckrodt Chemical, Inc., at (314) 530-2314.

Sincerely yours,

Cathleen S. Bumb

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Enclosures

cc: Patricia Hitt Duft, Esq.

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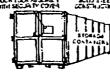
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